

COLUMBIA CORRIDOR

A S S O C I A T I O N

September 6, 2016

Environmental Protection Agency (EPA)
ATTN: Harbor Comments,
U.S. EPA
805 SW Broadway, Suite 500,
Portland, OR 97205

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Subject: Columbia Corridor Association comments on EPA Proposed Plan Remedy for Portland Harbor

The Columbia Corridor Association was founded in 1986 to provide a forum for broad-based support of the economic and employment development of the Corridor which includes the downstream portion of the Portland Harbor Superfund site. Over the years, the Association has evolved into an advocacy group for Corridor business and property owner interests, focusing on economic development, environmental land use, transportation, water, transit, workforce development and marketing issues. The Columbia Corridor Association (CCA) appreciates the opportunity to provide these comments to EPA's Proposed Plan for cleanup of the Portland Harbor. CCA feels strongly that the best way to protect the health of people and the environment is to implement cost effective plans that are proportional to the benefits gained from a cleanup action.

Portland Harbor is the largest seaport in Oregon. Employment in the working harbor has and continues to consist of middle income jobs for diverse communities for more than a century. The Portland working harbor includes public and private marine terminals, industrial parks, and other commercial and warehousing businesses. The business activity located within the Portland working harbor created \$4.2 billion of direct, induced and indirect personal wage and salary income and local consumptions expenditure for the Portland metropolitan residents¹. CCA has concerns about the impact of the proposed preferred alternative to those vital business operating in the harbor.

Since the listing of Portland Harbor as a Superfund site in 2000, impacts to the working harbor businesses have and continue to be burdensome. Already significant resources have been spent on controlling upland sources of continuing contamination through the leadership of Oregon

¹The Port of Portland's Marine Operations – Local Economic Benefits of Worldwide Trade, ECONorthwest, August, 2013. http://www.workingwaterfrontportland.org/pdfs/Port_of_Portland_Marine_Operations_Report_8-20-2013.pdf

Department of Environmental Quality (ODEQ). CCA has concerns that the preferred alternative has not adequately acknowledged the source control efforts or the natural recovery processes that are occurring at the site. As a result, EPA has overestimated the actual human health risks associated with the site, while at the same time, underestimated the benefits of the preferred alternative.

The cleanup will be funded largely by local businesses, local utilities and local and state government. The impacts to the region of diverting capital dollars to a cleanup effort will mean employees will not be hired or lose their existing job, capital investments are not made and operational and infrastructure efforts will be scaled back or not happen at all.

We believe that the cost estimate of the preferred alternative (\$746 M) issued by EPA dramatically understates the true cost of performing the proposed remediation, which will likely be more than \$1.5 billion. It includes a number of unrealistic assumptions: (1) 24/6 dredging; (2) seamless dredging with no breaks to reposition barges between cleanup areas, install sheet pile walls or account for unforeseen circumstances; and (3) availability of necessary dredge and barge equipment during limited fish windows. Furthermore, it is unclear how the agency was able to cut its prior cost projections in half in a matter of months while changing little in the way of cleanup action.

EPA's preferred cleanup alternative needs to be cost-effective and proportional to realistic assessment of the benefits that will justify the significant diversion of resources to cleanup actions. It is imperative that EPA recognize and considers these important economic impacts.

Portland stakeholders deserve a risk-based approach to sediment remediation that is rooted in sound science and protective of health, while maximizing value of our region's precious public, private and ratepayer dollars. We encourage you to use the most modern and up-to-date scientific data available while projecting cost and timeline estimates that are grounded in fact. The Columbia Corridor Association encourages you to produce a remedy that will serve the long-term interests of Portland stakeholders who will be impacted for decades to come.

Overall, CCA cannot support EPA's Proposed Plan because it underestimates costs, overestimates the benefits of cleanup actions, and does not adequately incorporate expertise at the State of Oregon for upland cleanup. CCA supports a cleanup plan that protects human health and the environment, is implementable and cost effective with minimal disruptions to the local community, economy and environment.

(b) (6)



Executive Director